

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

JGIAP RH 160 LLC

Plaintiff,

vs.

CRI HOLDING CORP., TOURAJ
NAGHIEH, MORALI AND ASSOCIATES,
ANTHONY MORALI, JOSEPH MORALI,
MANDA INTERNATIONAL
CORPORATION, STRIKEFORCE
MECHANICAL CORPORATION, AND
ANGELO CORRAO

Defendants.

Case No. 1:21-cv-2489-DG-JRC

Judge Diane Gujarati

Magistrate Judge James R. Cho

JOINT STATUS REPORT

PLEASE TAKE NOTICE that Plaintiff and Defendants (collectively, “the Parties”), by and through their undersigned counsel, file this Joint Status Report pursuant to the Court’s Order dated October 19, 2021.

On October 4, 2021, all parties participated in a court mandated settlement conference before Magistrate Judge James R. Cho. The parties were unsuccessful in coming to any settlement in this matter.

On October 19, 2021, all parties participated in a follow up settlement conference before Magistrate Judge James R. Cho. The parties again were unsuccessful in coming to any agreement on settlement.

On October 19, 2021, the Court ordered the parties to continue discussing settlement privately and to inform the Court of settlement status.

At this time, the parties do not believe that further settlement discussions would be productive and ask that the Court renew the defendants' premotion conference letters.

Respectfully submitted this 19th day of November, 2021.

ARMSTRONG TEASDALE LLP

By: /s/ Ryan M. Wilson

Ryan M. Wilson, Esq.
919 Third Avenue, 37th Floor
New York, NY 10022
(212) 209-4400
rwilson@atllp.com

Nicholas R. Peppler, (*pro hac vice*)
4643 S. Ulster Street, Ste. 800
Denver, CO 80237
(720) 200-0676
npeppler@atllp.com

ATTORNEYS FOR PLAINTIFF JGIAP RH
160 LLC

MARK S. FRIEDLANDER

By: /s/ Mark S. Friedlander

Mark S. Friedlander, Esq.
101 Lafayette Street, 10th Floor
New York, NY 10013
(212) 962-2877
Msfesg47@aol.com

ATTORNEY FOR DEFENDANT CRI
HOLDING CORP.

MILMAN LABUDA LAW GROUP PLLC

By: /s/ Michael J. Mauro

Michael J. Mauro, Esq.
Emanuel Kataev, Esq.
Kyle F. Monaghan, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899
michael@mllaborlaw.com
emanuel@mllaborlaw.com
kyle@mllaborlaw.com

ATTORNEYS FOR DEFENDANTS MANDA
INTERNATIONAL CORP, STRIKEFORCE
MECHANICAL CORP., ANGELO CORRAO

DONOVAN HATEM LLP

By: /s/ Scott K. Winikow

Scott K. Winikow, Esq.
112 W. 34th Street, 18th Floor
New York, NY 10120
(212) 244-3333
swinikow@optonline.net

ATTORNEY FOR DEFENDANTS ANTHONY
MORALI ARCHITECT, PLLC i/s/h/a/
MORALI AND ASSOCIATES, ANTHONY
MORALI, JOSEPH MORALI